

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
THE ROMAN CATHOLIC DIOCESE OF	:	Case No. 20-12345 (SCC)
ROCKVILLE CENTRE, NEW YORK, ¹	:	
	:	
Debtor.	:	
<hr/>		
THE ROMAN CATHOLIC DIOCESE OF	:	
ROCKVILLE CENTRE, NEW YORK,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Adv. Pro. No. 20-01226 (SCC)
	:	
ARK320 DOE, <i>et al.</i> , ²	:	
	:	
Defendants.	:	
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**STIPULATION AND ORDER PURSUANT TO 11 U.S.C. § 105(a)
STAYING CONTINUED PROSECUTION OF CERTAIN LAWSUITS**

This matter came before the Court on the *Motion for a Preliminary Injunction under Sections 362 and 105(a) of the Bankruptcy Code* [Adv. Pro. Docket No. 2] (the “Motion”),³ filed by The Roman Catholic Diocese of Rockville Centre, New York (the “Diocese”); the Court finding that (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §1334; (ii) this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O); (iii) the relief requested in the Motion

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

² A full list of the Defendants in this adversary proceeding is included in Exhibit A to the Verified Complaint for Declaratory and Injunctive Relief [Adv. Pro. Docket No. 1].

³ To the extent there are inconsistencies between terms defined in the Motion and in this Stipulation and Order, then this Stipulation and Order shall govern.

is in the best interests of the Diocese, its estate, and creditors; and (iv) after due deliberation, and good and sufficient cause appearing therefor, the Court hereby determines that the relief requested in the Motion should be granted on the terms set forth herein;

RECITALS

A. Attached hereto as Schedule 1 is a list of lawsuits or claims (collectively, the “CVA Actions” and each individually a “CVA Action”) against the Diocese, certain non-debtor affiliates of the Diocese (the “DRVC Related Parties”), and/or various third-parties (the “Non-Affiliate Defendants”, and collectively with the DRVC Related Parties, the “State Court Defendants”) which (a) were pending as of the Petition Date or (b) have been filed or otherwise asserted against State Court Defendants on or after the Petition Date, alleging that the Diocese and/or the named State Court Defendants are liable to the applicable plaintiff on account of sexual abuse or other tort claims.

B. The CVA Actions are stayed by operation of 11 U.S.C. § 362(a) to the extent they seek relief against the Diocese. On October 1, 2020, the Diocese filed an adversary proceeding [Adv. Pro. No. 20-01266] (the “Stay Adversary”) seeking a determination that the CVA Actions are automatically stayed pursuant to 11 U.S.C. § 362(a)(1) and/or (a)(3) or, alternatively, seeking entry of an order staying the CVA Actions pursuant to 11 U.S.C. § 105(a). The plaintiffs in the CVA Actions assert that the automatic stay does not, subject to compliance with applicable rules of civil procedure, prohibit them from pursuing claims against the State Court Defendants.

C. On October 1, 2020, the Diocese brought the Motion seeking an injunction pursuant to 11 U.S.C. §§ 105(a) and 362(a) staying the CVA Actions against each of the State Court Defendants through and including February 1, 2021. On October 23, 2020, the Committee filed the Objection to the Preliminary Injunction Motion [Adv. Pro. Docket No. 17]. On November 4, 2020, the Court entered a consensual order in the Stay Adversary granting the Diocese’s request

for a preliminary injunction and enjoining the prosecution of the CVA Actions through December 10, 2020 [Adv. Pro. Docket No. 36]. On December 10, 2020, the Court entered a consensual order in the Stay Adversary granting the Diocese's request for a preliminary injunction and enjoining the prosecution of the CVA Actions through December 21, 2020 [Adv. Pro. Docket No. 44]. And on December 21, 2020, the Court entered a consensual order in the Stay Adversary granting the Diocese's request for a preliminary injunction and enjoining the prosecution of the CVA Actions through January 14, 2021 [Adv. Pro. Docket No. 46].

D. The Diocese and the Committee, in consultation with the state court attorneys representing the members of the Committee, have agreed to stay the CVA Actions against all State Court Defendants in accordance with the terms set forth in this Stipulation and Order.

AND IT IS THEREFORE ORDERED AND AGREED THAT:

1. The foregoing recitals are incorporated herein by reference.
2. Pursuant to 11 U.S.C. § 105(a), except to the limited extent provided below, the CVA Actions set forth on Schedule 1 are hereby stayed as to the State Court Defendants and any and all further proceedings or other actions by the parties thereto in furtherance of their prosecution, are hereby stayed from the date hereof (the "Effective Date") through and including 11:59 p.m. (prevailing Eastern time) on March 31, 2021 (the "Termination Date").
3. Subject to Sections 5 and 6 below, prior to the occurrence of the Termination Date, no plaintiff shall prosecute against any State Court Defendant any action alleging claims substantially similar to those asserted by such plaintiff in a pending CVA Action, nor shall any plaintiff seek to sever his or her claims against the Diocese in any CVA Action in order to proceed with such CVA Action against any State Court Defendant.
4. Prior to the occurrence of the Termination Date, and absent further order of this Court for good cause, no State Court Defendant shall take any action against a plaintiff in any

CVA Action, including without limitation, seeking discovery or non-voluntary dismissal of the CVA Action, *except that* nothing herein shall preclude (1) a State Court Defendant from answering a complaint in a CVA Action, but any obligation to do so shall be tolled pursuant to Section 8 below, and (2) any Non-Affiliate Defendant from negotiating and/or consummating a settlement of any claims against such Non-Affiliate Defendant with any plaintiff in a CVA Action.

5. The stay imposed by this Stipulation and Order shall not prohibit or enjoin the filing of a complaint for purposes of commencing a CVA Action against, or service of a complaint related to any CVA Action upon, any of the State Court Defendants, including service of a complaint in any CVA Action filed prior to the Effective Date. Any stay pursuant to this Stipulation and Order or 11 U.S.C. § 362 (to the extent applicable) is hereby lifted to the limited extent necessary to (i) allow any person to serve and file a new CVA Action against any party (including, without limitation, a party already identified as a State Court Defendant), as well as to file and serve any proof of service therefor, and (ii) to allow any State Court Defendant or the Diocese to tender the defense of any CVA Actions or similar claims to any insurance carrier who may provide coverage, have provided coverage, or otherwise insure the claim at issue (each, an “Insurer”); *provided, however*, that nothing herein is intended to authorize any payment by an Insurer to or on behalf of a State Court Defendant if doing so would serve to reduce the amount of insurance coverage available to the Diocese.

6. State Court Defendants shall be served in accordance with the rules and procedures governing the applicable CVA Action. The individuals identified on Schedule 2 hereto are authorized to accept service for the State Court Defendants identified on such Schedule 2 as applicable.

7. Any plaintiff commencing or serving a new CVA Action shall provide copies of

the complaint via email to each of the undersigned counsel to the Diocese and the Committee within five (5) business days of service of this Stipulation and Order upon such person.

8. The period beginning on the Effective Date and ending on the Termination Date (the “Standstill Period”) shall not be included in computing the running of any time periods with respect to any (i) deadline to file an answer, motion to dismiss, or other responsive pleading, (ii) deadline to make or respond to dispositive motions or discovery demands, (iii) deadline to seek removal of an action to federal court, or (iv) other time deadlines (whether statutory, rule-based, equitable, contractual, or otherwise) relating to the prosecution or defense of the CVA Actions, such that all claims, defenses, rights and privileges with respect thereto shall be preserved and remain viable to the same extent that they existed as of the Effective Date, *provided, however*, that the foregoing shall not be deemed to extend or waive any applicable statutes of limitations, statutes of repose, laches or estoppel periods or other time deadlines or defenses relating to the initial assertion of a claim or filing of a CVA Action, and *provided further* that, upon the occurrence of the Termination Date, all State Court Defendants shall have not less than forty-five (45) days to file their initial answer, motion to dismiss, or other responsive pleading(s) in any CVA Action in which they are named.

9. Approximately every thirty (30) days after the Effective Date, the Diocese shall file an amended Schedule 1, which will include additional CVA Actions subject to this Stipulation and Order, on the Docket of the Chapter 11 Case; *provided, however*, that such schedule shall not identify the name of any plaintiff pursuant to the terms of the *Final Order (I) Authorizing and Approving Special Noticing and Confidentiality Procedures, (II) Authorizing and Approving Procedures for Providing Notice of Commencement, and (III) Granting Related Relief* [Docket No. 125] but shall identify the CVA Action by the Index Number or case number of the case.

10. The Termination Date may be extended by mutual agreement between the Diocese and the Committee, which shall be memorialized in a stipulation filed with the Court (an “Extension Notice”). Email notice of each Extension Notice shall be provided by the Diocese to all plaintiffs to CVA Actions (through their counsel of record in any CVA Action) and any other party that was served with notice of the Motion. Any party to a CVA Action may object to the application of such extension of the Termination Date to such CVA Action by filing with the Bankruptcy Court, within seven (7) days of the date of an Extension Notice, an objection setting forth the basis for its objection(s) to the Extension Notice (an “Extension Objection”) as it relates to such CVA Action. The Diocese and the Committee may file any replies in support of the Extension Notice within seven (7) days after the filing of an Extension Objection. Upon the filing of an Extension Objection by any party (an “Objecting Party”), the Termination Date with respect to such Objecting Party’s CVA Action shall be extended through and including the later of (a) the date on which the Bankruptcy Court enters an Order authorizing the Objecting Party to proceed with the prosecution of their respective CVA Action, or (b) if no order authorizing the Objecting Party to proceed with the prosecution of their respective CVA Action is entered by the Bankruptcy Court, the applicable Termination Date as may be extended pursuant to any current or future Extension Notice. An Objecting Party shall serve any Extension Objection on the undersigned counsel to the Committee and the undersigned counsel to the Diocese via email. Notwithstanding the filing of an Extension Objection, the Termination Date shall be extended as to any party who does not object to the Extension Notice.

11. The entry of this Stipulation and Order is without prejudice to the rights of the Diocese to enforce the terms of this Stipulation and Order, including through an injunction under 11 U.S.C. § 105(a), against any plaintiff that does not comply with the terms of this Stipulation

and Order. Nothing herein shall be construed to limit the rights of the Diocese to seek relief similar to the relief provided in this Stipulation and Order, including through an injunction under 11 U.S.C. § 105(a), against any party. In the event the Diocese takes any action seeking such an injunction on terms substantially similar to those set forth in this Stipulation and Order prior to the Termination Date, the Committee shall support such requested relief; *provided, however*, that nothing herein shall be construed to restrict or prohibit the rights of any party to oppose an extension of the Termination Date; and *provided further* that nothing herein shall be construed to restrict or prohibit the rights of the Committee or any plaintiff in a CVA Action to oppose any effort by the Diocese or any State Court Defendant(s) after the Termination Date to assert in any court that the automatic stay applies to automatically stay the CVA Action against it, or to seek to stay or enjoin any CVA Action. Nothing in the Motion or this Stipulation and Order shall be construed as an admission by the Committee or any plaintiff regarding any efforts by the Diocese or any State Court Defendant to obtain an order enforcing the automatic stay or enjoining prosecution of any CVA Action after the Termination Date.

12. Subject to the Committee's execution of a confidentiality and non-disclosure agreement in form and substance acceptable to the Diocese, the Diocese agrees to use commercially reasonable, good faith efforts to promptly begin providing the Committee documents in its possession responsive to the document requests described on Schedule 4 hereto no later than January 31, 2021, subject to the right of the Diocese or an interested DRVC Related Party to raise reasonable objections based upon scope, relevance, privilege, or other applicable law, *provided, however*, that prior to such production the Diocese shall cause names and other identifying information relating to any plaintiffs asserting a claim of sexual abuse to be redacted pursuant to a confidentiality protocol as agreed between the Diocese and the Committee. The

Diocese shall produce such documents on a rolling basis. Any disputes relating to the respected discovery shall be governed by the laws of the State of New York applicable to the CVA Actions. This Section 12 shall be enforceable by the Committee even if the Bankruptcy Court does not enter an Order approving this Stipulation and Order.

13. During the Standstill Period, the Diocese shall provide the Committee with 15 days' notice before the Bishop approves any transfer by a parish within the Diocese identified on Schedule 3 hereto of any (i) real property or (ii) property outside of the ordinary course of business with a value in excess of \$50,000. During such notice period, any plaintiff in a CVA Action and/or the Committee may take any action to oppose, unwind or enjoin such transfer in a court of competent jurisdiction, including without limitation, by filing a *lis pendens* with respect to the subject property. Any such action by a plaintiff or the Committee shall not be subject to any confidentiality obligation of the Committee and shall not be a violation of this Stipulation and Order; provided, however, that all other legal, equitable, and jurisdictional rights and defenses regarding any litigation, causes of action, or judicial proceeding initiated with respect to any potential transfer by a parish covered by this paragraph 13 are hereby reserved.

14. Nothing in this Stipulation and Order shall be construed to limit the Committee's right to seek discovery in other actions or proceedings on matters unrelated to the topics listed on Schedule 4 from the Diocese or any State Court Defendant through any means in accordance with applicable law or constitute a waiver of any right of the Diocese or any State Court Defendant to oppose any such discovery.

15. Nothing in this Stipulation and Order is intended or shall be deemed to constitute any admission or acknowledgement of any fact, conclusion of law, potential liability or liability of any party, nor does this Stipulation and Order constitute a waiver by any party of any time-

based defenses, except to the extent any otherwise applicable deadlines may be tolled during the Standstill Period as provided herein. Except as otherwise provided herein, all parties shall be deemed to reserve all available rights, remedies, claims and defenses without waiver.

16. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Stipulation and Order are immediately effective and enforceable upon its entry.

17. The Diocese is authorized to file a copy of this Stipulation and Order (including any amended Schedules thereto) with any court in which a CVA Action is or may hereafter become pending as proof that such action is stayed and enjoined as set forth herein.

18. Nothing herein shall be construed to limit or affect any party's right to seek appropriate relief from this Court to the extent necessary to respond to any actions by a court in which a CVA Action is pending that, but for the stay provided herein, would require a party to act before the Termination Date.

19. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Stipulation and Order.

Dated: January 22, 2021
New York, New York

/S/ Shelley C. Chapman
Hon. Shelley C. Chapman
United States Bankruptcy Judge

STIPULATED AND AGREED TO BY:

JONES DAY

/s/ Corinne Ball

Corinne Ball
Todd Geremia
Benjamin Rosenblum
Andrew Butler
Benjamin Thomson
JONES DAY
250 Vesey Street
New York, NY 10281-1047
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Email: cball@jonesday.com
trgeremia@jonesday.com
brosenblum@jonesday.com
abutler@jonesday.com
bthomson@jonesday.com

-and-

Christopher DiPompeo (*pro hac vice*)
JONES DAY
51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-7686
Facsimile: (202) 626-1700
Email: cdipompeo@jonesday.com

*Counsel for the Debtor and
Debtor in Possession*

PACHULSKI STANG ZIEHL & JONES
LLP

By: /s/ James I. Stang

James I. Stang (*pro hac vice*)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: (310) 277-6910
jstang@pszjlaw.com

Ilan D. Scharf
Karen B. Dine
Brittany Michael
780 Third Avenue, 34th Floor
New York, NY 10017
Telephone: (212) 561-7700
ischarf@pszjlaw.com

*Attorneys for the Official Committee of
Unsecured Creditors*

SCHEDULE 1

CVA Actions

	Plaintiff(s)	Index No.
1.	NAME ON FILE	506103/2020
2.	NAME ON FILE	506559/2020
3.	NAME ON FILE	512125/2020
4.	NAME ON FILE	512319/2020
5.	NAME ON FILE	512833/2020
6.	NAME ON FILE	513632/2020
7.	NAME ON FILE	513885/2020
8.	NAME ON FILE	515746/2020
9.	NAME ON FILE	517428/2020
10.	NAME ON FILE	517533/2020
11.	NAME ON FILE	518025/2020
12.	NAME ON FILE	518289/2020
13.	NAME ON FILE	518726/2019
14.	NAME ON FILE	519191/2019
15.	NAME ON FILE	519862/2019
16.	NAME ON FILE	522308/2019
17.	NAME ON FILE	524748/2019
18.	NAME ON FILE	526614/2019
19.	NAME ON FILE	527922/2019
20.	NAME ON FILE	600873/2020
21.	NAME ON FILE	605941/2020
22.	NAME ON FILE	606396/2020
23.	NAME ON FILE	606672/2020
24.	NAME ON FILE	606674/2020
25.	NAME ON FILE	607467/2020
26.	NAME ON FILE	607768/2020
27.	NAME ON FILE	608381/2020
28.	NAME ON FILE	609115/2020
29.	NAME ON FILE	610600/2020
30.	NAME ON FILE	611155/2019
31.	NAME ON FILE	615903/2019
32.	NAME ON FILE	617355/2019
33.	NAME ON FILE	618528/2019
34.	NAME ON FILE	618542/2019
35.	NAME ON FILE	619881/2019
36.	NAME ON FILE	620497/2019
37.	NAME ON FILE	621553/2019
38.	NAME ON FILE	624824/2019
39.	NAME ON FILE	900001/2019

	Plaintiff(s)	Index No.
40.	NAME ON FILE	900002/2019
41.	NAME ON FILE	900002/2020
42.	NAME ON FILE	900003/2019
43.	NAME ON FILE	900003/2020
44.	NAME ON FILE	900004/2019
45.	NAME ON FILE	900004/2020
46.	NAME ON FILE	900043/2020
47.	NAME ON FILE	900005/2019
48.	NAME ON FILE	900006/2019
49.	NAME ON FILE	900006/2020
50.	NAME ON FILE	900007/2019
51.	NAME ON FILE	900008/2019
52.	NAME ON FILE	900008/2020
53.	NAME ON FILE	900010/2019
54.	NAME ON FILE	900010/2020
55.	NAME ON FILE	900011/2019
56.	NAME ON FILE	900011/2020
57.	NAME ON FILE	900012/2019
58.	NAME ON FILE	900012/2020
59.	NAME ON FILE	900013/2019
60.	NAME ON FILE	900013/2020
61.	NAME ON FILE	900014/2019
62.	NAME ON FILE	900014/2020
63.	NAME ON FILE	900015/2019
64.	NAME ON FILE	900015/2020
65.	NAME ON FILE	900016/2019
66.	NAME ON FILE	900017/2019
67.	NAME ON FILE	900017/2020
68.	NAME ON FILE	900018/2020
69.	NAME ON FILE	900019/2019
70.	NAME ON FILE	900020/2019
71.	NAME ON FILE	900021/2019
72.	NAME ON FILE	900022/2019
73.	NAME ON FILE	900022/2020
74.	NAME ON FILE	900024/2019
75.	NAME ON FILE	900025/2019
76.	NAME ON FILE	900027/2019
77.	NAME ON FILE	900028/2019
78.	NAME ON FILE	900029/2019
79.	NAME ON FILE	900029/2020
80.	NAME ON FILE	900030/2020
81.	NAME ON FILE	900031/2019
82.	NAME ON FILE	900031/2020
83.	NAME ON FILE	900032/2019

	Plaintiff(s)	Index No.
84.	NAME ON FILE	900032/2020
85.	NAME ON FILE	900033/2020
86.	NAME ON FILE	900035/2019
87.	NAME ON FILE	900036/2019
88.	NAME ON FILE	900036/2020
89.	NAME ON FILE	900037/2019
90.	NAME ON FILE	900039/2019
91.	NAME ON FILE	900040/2019
92.	NAME ON FILE	900041/2019
93.	NAME ON FILE	900041/2020
94.	NAME ON FILE	900042/2019
95.	NAME ON FILE	900044/2020
96.	NAME ON FILE	900045/2019
97.	NAME ON FILE	900045/2020
98.	NAME ON FILE	900046/2019
99.	NAME ON FILE	900046/2020
100.	NAME ON FILE	900047/2020
101.	NAME ON FILE	900048/2019
102.	NAME ON FILE	900048/2020
103.	NAME ON FILE	900050/2019
104.	NAME ON FILE	900050/2020
105.	NAME ON FILE	900051/2019
106.	NAME ON FILE	900051/2020
107.	NAME ON FILE	900052/2019
108.	NAME ON FILE	900052/2020
109.	NAME ON FILE	900053/2019
110.	NAME ON FILE	900053/2020
111.	NAME ON FILE	900054/2019
112.	NAME ON FILE	900054/2020
113.	NAME ON FILE	900055/2020
114.	NAME ON FILE	900056/2020
115.	NAME ON FILE	900057/2019
116.	NAME ON FILE	900057/2020
117.	NAME ON FILE	900058/2020
118.	NAME ON FILE	900059/2020
119.	NAME ON FILE	900060/2020
120.	NAME ON FILE	900061/2020
121.	NAME ON FILE	900062/2020
122.	NAME ON FILE	900063/2020
123.	NAME ON FILE	900064/2019
124.	NAME ON FILE	900064/2020
125.	NAME ON FILE	900065/2020
126.	NAME ON FILE	900066/2020
127.	NAME ON FILE	900067/2020

	Plaintiff(s)	Index No.
128.	NAME ON FILE	900068/2019
129.	NAME ON FILE	900068/2020
130.	NAME ON FILE	900069/2019
131.	NAME ON FILE	900069/2020
132.	NAME ON FILE	900070/2019
133.	NAME ON FILE	900070/2020
134.	NAME ON FILE	900071/2019
135.	NAME ON FILE	900071/2020
136.	NAME ON FILE	900072/2019
137.	NAME ON FILE	900072/2020
138.	NAME ON FILE	900073/2019
139.	NAME ON FILE	900073/2020
140.	NAME ON FILE	900074/2020
141.	NAME ON FILE	900075/2020
142.	NAME ON FILE	900076/2020
143.	NAME ON FILE	900077/2020
144.	NAME ON FILE	900078/2020
145.	NAME ON FILE	900079/2020
146.	NAME ON FILE	900080/2020
147.	NAME ON FILE	900081/2020
148.	NAME ON FILE	900084/2020
149.	NAME ON FILE	900085/2020
150.	NAME ON FILE	900086/2020
151.	NAME ON FILE	900087/2020
152.	NAME ON FILE	900094/2020
153.	NAME ON FILE	900095/2020
154.	NAME ON FILE	900099/2020
155.	NAME ON FILE	900101/2020
156.	NAME ON FILE	900102/2020
157.	NAME ON FILE	900103/2020
158.	NAME ON FILE	900105/2020
159.	NAME ON FILE	900107/2020
160.	NAME ON FILE	900109/2020
161.	NAME ON FILE	900110/2020
162.	NAME ON FILE	900111/2020
163.	NAME ON FILE	900112/2020
164.	NAME ON FILE	900113/2020
165.	NAME ON FILE	900114/2020
166.	NAME ON FILE	900115/2020
167.	NAME ON FILE	900117/2020
168.	NAME ON FILE	900118/2020
169.	NAME ON FILE	900119/2020
170.	NAME ON FILE	900120/2020
171.	NAME ON FILE	900121/2020

	Plaintiff(s)	Index No.
172.	NAME ON FILE	900122/2020
173.	NAME ON FILE	900124/2020
174.	NAME ON FILE	900125/2020
175.	NAME ON FILE	900126/2020
176.	NAME ON FILE	900127/2020
177.	NAME ON FILE	900128/2020
178.	NAME ON FILE	900129/2020
179.	NAME ON FILE	900130/2020
180.	NAME ON FILE	900131/2020
181.	NAME ON FILE	900132/2020
182.	NAME ON FILE	900133/2020
183.	NAME ON FILE	900134/2020
184.	NAME ON FILE	900135/2020
185.	NAME ON FILE	900136/2020
186.	NAME ON FILE	900137//2020
187.	NAME ON FILE	900138/2020
188.	NAME ON FILE	900139/2020
189.	NAME ON FILE	900143/2020
190.	NAME ON FILE	900145/2020
191.	NAME ON FILE	900149/2020
192.	NAME ON FILE	900150/2020
193.	NAME ON FILE	900152/2020
194.	NAME ON FILE	900153/2020
195.	NAME ON FILE	900165/2020
196.	NAME ON FILE	900168/2020
197.	NAME ON FILE	900170/2020
198.	NAME ON FILE	900171/2020
199.	NAME ON FILE	900172/2020
200.	NAME ON FILE	900173/2020
201.	NAME ON FILE	900174/2020
202.	NAME ON FILE	950002/2019
203.	NAME ON FILE	950167/2019
204.	NAME ON FILE	950169/2019
205.	NAME ON FILE	950229/2020
206.	NAME ON FILE	950245/2020
207.	NAME ON FILE	950535/2020
208.	NAME ON FILE	950642/2020
209.	NAME ON FILE	950685/2020
210.	NAME ON FILE	614160/2020
211.	NAME ON FILE	70134/2020E
212.	NAME ON FILE	900001/2021

SCHEDULE 2

Counsel Authorized to
Accept Service for Certain
Defendants

	Defendant	Counsel Authorized to Accept Service
1.	Catholic Charities of the Diocese of Rockville Centre	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
2.	Church of The Blessed Sacrament	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
3.	Church of Saint Francis of Assisi	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
4.	Church of St. Anne, Garden City	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
5.	Church of St. Anthony of Padua, East Northport	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
6.	Church of St. Rosalie	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200

		cjadams@pfapc.com
7.	Church of the Good Shepherd, Holbrook	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
8.	Corpus Christi Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
9.	Holy Angels Regional School f/k/a St. Francis De Sales Catholic School	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
10.	Holy Family Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
11.	Holy Family Catholic School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
12.	Holy Spirit a/k/a Church of the Holy Spirit	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
13.	Holy Trinity Diocesan High School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596

		516-248-1200 bdavey@mmlaw.us.com
14.	Infant Jesus Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
15.	Notre Dame Church, New Hyde Park	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
16.	Our Holy Redeemer	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
17.	Our Lady of Fatima	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
18.	Our Lady of Grace Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
19.	Our Lady of Loretto Parish and School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
20.	Our Lady of Lourdes Church, Malverne	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave

		Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
21.	Our Lady of Peace	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
22.	Our Lady Of Perpetual Help Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
23.	Our Lady of Victory	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
24.	Our Lady Queen of Martyrs	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
25.	Parish Of St. Agnes Cathedral Church And School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
26.	Parish of St. Christopher	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
27.	Saints Philip and James Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739

		631-666-6200 cjadams@pfapc.com
28.	Queen of the Most Holy Rosary	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
29.	Roman Catholic Church of Saints Cyril and Methodius	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
30.	Roman Catholic Church of the Sacred Heart	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
31.	Sacred Hearts of Jesus and Mary	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
32.	Saint Aidan Church and School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
33.	Saint Barnabas The Apostle Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
34.	Saint Catherine of Sienna Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer

		374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
35.	Saint Elizabeth Ann Seton Regional School	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
36.	Saint Martha Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
37.	Saint Martin of Tours Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
38.	Saints Cyril and Methodius School	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
39.	St. Andrew Roman Catholic Church and School	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
40.	St. Bernard's Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
41.	St. Boniface Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer

		374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
42.	St. Boniface Martyr School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
43.	St. Brigid	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
44.	St. Dominic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
45.	St. Elizabeth Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
46.	St. Hedwig's Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
47.	St. Hugh of Lincoln Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
48.	St. Hyacinth Parish	Charles J. Adams Patrick F. Adams, P.C.

		3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
49.	St. Ignatius Loyola	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
50.	St. James Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
51.	St. John the Baptist Diocesan High School	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
52.	St. John of God	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
53.	St. John the Evangelist	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
54.	St. Joseph Catholic School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
55.	St. Joseph Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer

		374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
56.	St. Jude Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
57.	St. Kilian Roman Catholic Church	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
58.	St. Lawrence the Martyr Roman Catholic Church and School	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
59.	St. Luke's Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
60.	St. Margaret of Scotland Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
61.	St. Mary Roman Catholic Church [Manhasset]	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
62.	St. Mary Roman Catholic Church [East Islip]	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739

		631-666-6200 cjadams@pfapc.com
63.	St. Mary's Elementary School	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
64.	St. Patrick's Parish and School [Glen Cove]	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
65.	St. Patrick's Parish and School [Huntington; Bayshore]	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
66.	St. Paul the Apostle Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
67.	St. Philip Neri Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
68.	St. Raphael	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
69.	St. Raymond's a/k/a The Parish Family of Saint Raymond of Penyafort	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596

		516-248-1200 bdavey@mmlaw.us.com
70.	St. Sylvester Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
71.	St. Therese of Lisieux Roman Catholic Church	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
72.	St. Thomas the Apostle Parish	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
73.	St. Vincent de Paul Parish	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com
74.	The Roman Catholic Church of Christ the King	Charles J. Adams Patrick F. Adams, P.C. 3500 Sunrise Highway, Building 300 Great River, New York 11739 631-666-6200 cjadams@pfapc.com
75.	The Roman Catholic Church of St. Rose of Lima	Brian R. Davey Mulholland Minion Davey McNiff & Beyrer 374 Hillside Ave Williston Park, NY 11596 516-248-1200 bdavey@mmlaw.us.com

** Indicates a parish that is closed, has merged with another or is otherwise inactive at this time.

SCHEDULE 3

State Court Defendants Related to Diocese

	Defendant
1.	Church Of The Blessed Sacrament
2.	Church of Saint Francis of Assisi
3.	Church of St. Anne, Garden City
4.	Church of St. Anthony of Padua, East Northport
5.	Church of St. Rosalie
6.	Church of the Good Shepherd, Holbrook
7.	Corpus Christi Roman Catholic Church
8.	Holy Family Roman Catholic Church
9.	Holy Spirit a/k/a Church of the Holy Spirit
10.	Infant Jesus Roman Catholic Church
11.	Notre Dame Church, New Hyde Park
12.	Our Holy Redeemer
13.	Our Lady of Fatima
14.	Our Lady of Grace Roman Catholic Church
15.	Our Lady of Loretto Parish
16.	Our Lady of Lourdes Church, Malverne
17.	Our Lady of Peace
18.	Our Lady Of Perpetual Help Roman Catholic Church
19.	Our Lady of Victory
20.	Our Lady Queen of Martyrs
21.	Parish Of St. Agnes Cathedral Church
22.	Parish of St. Christopher
23.	Saints Philip and James Roman Catholic Church
24.	Queen of the Most Holy Rosary
25.	Roman Catholic Church of Saints Cyril and Methodius
26.	Roman Catholic Church of the Sacred Heart
27.	Sacred Hearts of Jesus and Mary
28.	Saint Barnabas The Apostle Roman Catholic Church
29.	Saint Catherine of Sienna Roman Catholic Church
30.	Saint Martha Roman Catholic Church
31.	Saint Martin of Tours Roman Catholic Church
32.	St. Andrew Roman Catholic Church
33.	St. Bernard's Roman Catholic Church
34.	St. Boniface Roman Catholic Church
35.	St. Brigid
36.	St. Dominic Church
37.	St. Elizabeth Church
38.	St. Hedwig's Roman Catholic Church
39.	St. Hugh of Lincoln Roman Catholic Church
40.	St. Hyacinth Parish

41.	St. Ignatius Loyola
42.	St. James Roman Catholic Church
43.	St. John of God
44.	St. John the Evangelist
45.	St. Joseph Roman Catholic Church
46.	St. Jude Roman Catholic Church
47.	St. Kilian Roman Catholic Church
48.	St. Lawrence the Martyr Roman Catholic Church
49.	St. Luke's Roman Catholic Church
50.	St. Margaret of Scotland Church
51.	St. Mary Roman Catholic Church
52.	St. Patrick's Parish
53.	St. Paul the Apostle Church
54.	St. Philip Neri Roman Catholic Church
55.	St. Raphael
56.	St. Raymond's a/k/a The Parish Family of Saint Raymond of Penyafort
57.	St. Sylvester Roman Catholic Church
58.	St. Therese of Lisieux Roman Catholic Church
59.	St. Thomas the Apostle Parish
60.	St. Vincent de Paul Parish
61.	The Roman Catholic Church of Christ the King
62.	The Roman Catholic Church of St. Rose of Lima

Schedule 4

Document Requests

Documents that would otherwise be produced to plaintiffs in the underlying CVA Actions, including, but not limited to, relevant and non-privileged (subject to provision of a privilege log) personnel and assignment history records, and correspondence, letters, emails, reports, complaints, disciplinary records, and laicization documents, concerning allegations of abuse, for each individual accused of committing sexual abuse or facilitating the sexual abuse of any plaintiff in the underlying CVA Actions (each a “Subject Individual”); and all confidential documents, including the strictly confidential documents, maintained by the Bishop pursuant to *Crimen Sollicitationis* (Crime of Solicitation) (1962) (Instruction of the Supreme Sacred Congregation of the Holy Office) concerning a Subject Individual.